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6 Counsel for Defendant VALERIAN DOBRE
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8 IN THE UNITED STATES DISTRICT COURT
9 FOR THE NORTHERN DISTRICT OF CALIFORNIA
10

11 UNITED STATES OF AMERICA,)	No. CR 07-00560 JSW
)	
12 Plaintiff,)	
)	
13 v.)	[PROPOSED] ORDER AND
)	STIPULATION CONTINUING HEARING
14 VALERIAN DOBRE,)	DATE FROM FEBRUARY 28, 2008 TO
)	MARCH 27, 2008 AND EXCLUDING
15 Defendant.)	TIME FROM THE SPEEDY TRIAL ACT
)	CALCULATION UNDER 18 U.S.C.
)	§ 3161(h)(8)(A)

16
17
18 The undersigned parties stipulate as follows:

- 19 1. The parties in this matter are currently scheduled to appear before the Court for
20 status/change of plea on February 28, 2008 at 2:30 p.m.
- 21 2. Undersigned counsel for Mr. Dobre was appointed pursuant to a substitution of counsel
22 on January 28, 2008. While counsel has worked diligently in investigating the case since
23 that day, the parties agree that an additional month of investigation is warranted due to
24 the complexity of the matter and the need to arrange an interpreter for effective
25 communication with Mr. Dobre.

26 //

United States v. Valerian Dobre 07-00560 JSW
Stipulation and Order Continuing Status Hearing

1 3. The parties thus request that the matter be continued by four weeks from February 28,
2 2008 to March 27, 2008 at 2:30 p.m. Additionally, the parties agree that an exclusion of
3 time from February 28, 2008 to March 28, 2008 is appropriate under the Speedy Trial
4 Act, 18 U.S.C. § 3161(h)(8)(A). The parties agree that the fact-intensive nature of this
5 case and the need for an interpreter to effectuate attorney-client communications with Mr.
6 Dobre justifies additional time for effective preparation on the part of defense counsel.
7 IT IS SO STIPULATED.

8
9 DATED: February 27, 2008

_____/s/_____
10

CHRISTINA HUA
Assistant United States Attorney

11
12 DATED: February 27, 2008

_____/s/_____
13

ERIC MATTHEW HAIRSTON
Attorney for Defendant

14
15 **[PROPOSED] ORDER**

16 With the agreement of the parties, and with the consent of the defendant, the
17 Court enters this order (1) continuing the next appearance before this Court from February 28,
18 2008 to March 27, 2008; and (2) excluding time from February 28, 2008 to March 27, 2008
19 under the Speedy Trial Act, 18 U.S.C. § 3161(h)(8)(A).

20 **IT IS SO ORDERED.**

21
22 DATED: _____

23 THE HON. JOSEPH S. WHITE
United States District Judge